

From: [David Smith](#)
To: [Richard Brown](#); [Osborne, Evan](#)
Cc: [Chris Weiser](#); [Burgess, Karen](#)
Subject: RE: EPA cannot make completeness determination re: DJS 2-14; please submit additional information
Date: Thursday, April 23, 2020 1:35:17 PM

Evan and Richard,

I transferred the updated version of the injection permit application to the Onedrive site this morning as a Word document. After test opening a few times, some of the graphics appeared to be altered in some cases, that file is still in the folder.

I resaved the updated application as a .pdf file, the graphics in that file appear correct. That file is now loaded in the Onedrive folder, in folder "A – Injection Permit Application".

It is the "EPA Class II Injection Permit SROG Updates EPA Requested 04.16.20.pdf" version.

Regards,
Dave

From: Richard Brown <richard@weiserbrown.email>
Sent: Thursday, April 23, 2020 3:08 PM
To: Osborne, Evan <Osborne.Evan@epa.gov>
Cc: Chris Weiser <chrisw@weiser-brown.com>; David Smith <(b) (6)>;
Burgess, Karen <Burgess.Karen@epa.gov>
Subject: RE: EPA cannot make completeness determination re: DJS 2-14; please submit additional information

Thanks Evan and I expect we both get confirmation from Dave here shortly that the application went. Glad to know the sun is out and spring is close for us! RB

From: Osborne, Evan <Osborne.Evan@epa.gov>
Sent: Thursday, April 23, 2020 3:05 PM
To: Richard Brown <richard@weiserbrown.email>
Cc: Chris Weiser <chrisw@weiser-brown.com>; David Smith <(b) (6)>;
Burgess, Karen <Burgess.Karen@epa.gov>
Subject: RE: EPA cannot make completeness determination re: DJS 2-14; please submit additional information

Richard,

All is well up here – the sun is out, but we're all working inside. I hope soon enough life will be back to normal, but for time being I'm grateful.

I'll be checking the folder for the updated version. When the documents are submitted, please notify me so that I can confirm that the transfer happened successfully.

Once the EPA determines that SROG's application is complete, we will finalize our technical review of the application (as a reminder – EPA has already completed a large part of the technical review of this project after it was submitted under a different operator, AM Idaho, LLC). When that is complete, the Agency may be required to submit a request to SROG for modifications, supplementations, and/or clarifications as needed. I want to make this clear to all, in order to manage expectations – **the results of a full technical review still have not been communicated to SROG, and as such, there may still remain a concerns regarding the technical aspects of the permit (i.e., geology, engineering, etc.) that need to be addressed.** This process was near completion last winter prior to the change in ownership.

As you know, this has been a lengthy and time-intensive work project for all involved, including our program. Our commitment is, and has been, to first evaluate your application for completeness, then judge the specific technical information in the permit application so as to ensure protection of Underground Sources of Drinking Water as required by the Safe Drinking Water Act. The process for our review is dictated by the UIC regulations, and the timeline for accomplishing this work is dependent on the standardized approach taken by EPA. We remain committed to doing so in a timely manner.

I am happy to talk with you if you have any questions or concerns,

Evan

From: Richard Brown <richard@weiserbrown.email>
Sent: Thursday, April 23, 2020 9:09 AM
To: Osborne, Evan <Osborne.Evan@epa.gov>
Cc: Chris Weiser <chrisw@weiser-brown.com>; David Smith (b) (6) >;
Richard Brown <richard@weiserbrown.email>
Subject: RE: EPA cannot make completeness determination re: DJS 2-14; please submit additional information

Evan-I hope this note finds you and your family safe and sound. My understanding is Seattle and the state of Washington are hopefully on the backside of the pandemic. Our Governor is to speak today. We expect more return to normalcy in Idaho but a slow process. Dave Smith will be forwarding the updated application later this morning into your digital Microsoft Onedrive folder. My understanding is the regular EPA email address can't receive digital files larger than 10 MB and the application is 18 MB. I hope everyone appreciates the number of man hours we have now put into this application. For these supplements alone, we spent an estimated 50 additional man hours. From inception of the application, we have spent well over 350 hours in geologic, geophysical, engineering, land, administrative and legal time. Hopefully we can now move forward. Thanks in advance-Richard Brown

Richard Brown, Weiser-Brown Oil Co.
Snake River Oil and Gas LLC
Cell/Office 713-818-6856
(b) (6)

From: Osborne, Evan <Osborne.Evan@epa.gov>
Sent: Friday, March 20, 2020 4:40 PM
To: Richard Brown <richard@weiserbrown.email>
Cc: David Smith (b) (6) <[com](mailto:(b)(6).com)>
Subject: EPA cannot make completeness determination re: DJS 2-14; please submit additional information

Mr. Brown,

EPA has completed a preliminary review for completeness of the Willow Sands Class II Disposal permit application (7520-6 and Attachments, prospective permit number ID-2D001-A) received by EPA on 3/16/2020. There were several items that we were not able to locate in the application. These include:

- (Attachment B): (In topographic maps) within one mile of the property boundary, display of intake and discharge structures, and hazardous waste treatment, storage, and disposal facilities. The maps also did not include, within the Area of Review, the number or name, and location of all wells (producing, injection, abandoned, drywells); mines (surface and subsurface), quarries, and other pertinent features including residences and roadways. Please submit a statement indicating that these features do not exist within the specified area if applicable.
- (Attachment C): Data on wells within the Area of Review intersecting the injection zone. Please submit a statement indicating that these wells do not exist within the specified area if applicable.
- (Attachment G): Fracture pressure of the confining intervals.
- (Attachment I): Testing programs to obtain fluids pressure; physical and chemical characteristics of the injection zone.
- (Attachment P): A proposed monitoring program.
- (Attachment T): A list of existing EPA permits.
- (Attachment U): A list of all businesses involved in ownership of the facility.

Please provide this information in support of your permit application at your soonest convenience. We may accept updated sections or an entirely new application – whatever method best

communicates this information. If you believe that any of the above information was included, please respond to this email indicating as such. I spoke with Dave Smith today on the phone and shared this information.

Once EPA received the above information the Agency will be able to make a completeness determination. Feel free to contact me by phone or email if you have follow-up questions.

Thank you,
Evan Osborne

Evan Osborne | U.S. EPA Region 10 |
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